

# **EXHIBIT B**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA**

TS-OPTICS CORPORATION	)	Civil Action No. 8:24-cv-01974-DOC-DFM
	)	
	)	
Plaintiff,	)	LETTER OF REQUEST
	)	(LETTERS ROGATORY)
v.	)	
	)	
MICROSOFT CORPORATION	)	
	)	
Defendant.	)	

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**LETTER OF REQUEST (LETTERS ROGATORY)**

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THE UNITED STATES DISTRICT COURT FOR THE CENTRAL DISCTRICT OF CALIFORNIA, USA,  
PRESENTS ITS COMPLIMENTS TO THE APPROPRIATE JUDICIAL AUTHORITY OF JAPAN, AND  
REQUESTS INTERNATIONAL JUDICIAL ASSISTANCE TO EFFECT SERVICE OF PROCESS TO BE  
USED IN A CIVIL PROCEEDING BEFORE THIS COURT IN THE ABOVE CAPTIONED MATTER. A  
TRIAL FOR THIS MATTER HAS NOT BEEN SCHEDULED. THIS REQUEST IS BEING MADE  
PURSUANT TO THE HAGUE CONVENTION OF 18 MARCH 1970 ON THE TAKING OF EVIDENCE  
ABROAD IN CIVIL OR COMMERCIAL MATTERS.

**SENDER AND JUDICIAL AUTHORITY OF THE REQUESTING STATE:**

THE UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
RONALD REAGAN FEDERAL BUILDING AND UNITED STATES COURTHOUSE  
411 WEST FOURTH STREET, COURTROOM 10A  
SANTA ANA, CALIFORNIA 92701 USA

**CENTRAL AUTHORITY OF THE REQUESTED STATE:**

MINISTRY OF FOREIGN AFFAIRS

2-2-1 KASUMIGASEKI CHIYODA-KU

TOKYO 100-8919 JAPAN

**PERSON(S) TO WHOM THE EXECUTED REQUEST, AND RESPONSES ARE TO BE RETURNED:**

RUSS AUGUST & KABAT

12424 WILSHIRE BOULEVARD, 12<sup>TH</sup> FLOOR

LOS ANGELES, CALIFORNIA 90025 USA

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**SPECIFICATION OF THE DATE ON WHICH THE REQUESTING AUTHORITY REQUESTS THE PRODUCTION OF DOCUMENTS AND DEPOSITION PURSUANT TO THE LETTER OF REQUEST:**

PRODUCTION OF DOCUMENTS DESCRIBED IN SCHEDULE A OF THE SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IS REQUIRED TO BE ELECTRONICALLY PROVIDED TO COUNSEL FOR PLAINTIFF WITHIN 30 DAYS FROM THE DATE OF SERVICE OF THE SUBPOENA.

DEPONENT IS REQUIRED TO TESTIFY BY REMOTE VIDEO CONFERENCE AS DESCRIBED IN SCHEDULE A OF THE SUBPOENA TO TESTIFY AT A DEPOSITION WITHIN 30 DAYS FROM THE DATE OF SERVICE OF THE SUBPOENA.

**REASON FOR URGENCY:**

THE URGENCY FOR REQUESTING THE INFORMATION IS BASED ON THE FOLLOWING REASON: PLAINTIFF'S ATTORNEYS WISH TO REVIEW THE REQUESTED DOCUMENTS IN A SUFFICIENTLY EXPEDITED TIME FRAME TO MEET THE DISCOVERY DEADLINE.

**NAMES OF THE CASE AND IDENTIFYING CASE NUMBER:**

TS-OPTICS CORPORATION v. MICROSOFT CORPORATION

CIVIL ACTION NO.: 8:24-cv-01974-DOC-DFM

**NAMES AND ADDRESSES OF THE PARTIES AND THEIR REPRESENTATIVES:**

RUSS AUGUST & KABAT  
12424 WILSHIRE BOULEVARD, 12<sup>TH</sup> FLOOR  
LOS ANGELES, CALIFORNIA 90025 USA  
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*Attorney for Plaintiff, Microsoft Corporation*

**NATURE OF THE ORIGINAL PROCEEDINGS:**

CIVIL COMPLAINT FOR PATENT INFRINGEMENT. THE PLAINTIFF SEEKS TO HAVE THE ISSUES BE DETERMINED BY THE COURT OF JURISDICTION.

**EVIDENCE TO BE OBTAINED:**

PLAINTIFF SEEKS TO OBTAIN EVIDENCE WHICH IS RELATED TO THE CASE FROM **HITACHI-LG DATA STORAGE, INC.** TO DETERMINE FACTS OF THE CASE. DOCUMENTS AND TESTIMONY TO BE OBTAINED FROM **HITACHI-LG DATA STORAGE, INC.** RELATED TO THIS CASE WILL HELP CLARIFY ISSUES THAT ARE RAISED IN THE CASE.

**PURPOSE OF THE EVIDENCE SOUGHT:**

FOR PURPOSE OF DISCOVERY AND EVIDENTIARY USE AT TRIAL OR ANY HEARING FOR THIS MATTER.

**IDENTITY AND ADDRESS OF THE PERSON OR BUSINESS ENTITY REQUESTED TO PROVIDE DOCUMENTS AND TESTIMONY:**

**HITACHI-LG DATA STORAGE, INC.**

108-0022 22-23, KAIGAN 3CHOME

MINATO-KU, TOKY, JAPAN

**REQUEST:**

THIS COURT REQUESTS THE ASSISTANCE DESCRIBED HEREIN AS NECESSARY IN THE INTERESTS OF JUSTICE. THE ASSISTANCE REQUESTED IS THAT THE APPROPRIATE JUDICIAL AUTHORITY OF JAPAN:

1. CAUSE THE SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES AND ALSO THE SUBPOENA TO TESTIFY AT A DEPOSITION TO BE SERVED UPON HITACHI-LG DATA STORAGE, INC. AT 108-0022 22-23, KAIGAN 3CHOME, MINATO-KU, TOKYO, JAPAN;  
  
AND
2. RETURN THE PROOF OF SERVICE ("CERTIFICATE") TO THIS COURT.

**RECIPROCITY:**

THE UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF CALIFORNIA, EXPRESSES A WILLINGNESS TO PROVIDE SIMILAR ASSISTANCE TO JUDICIAL

AUTHORITIES OF JAPAN.

**REIMBURSEMENT FOR COSTS:**

THE ATTORNEYS FOR PLAINTIFF EXPRESS A WILLINGNESS TO REIMBURSE THE JUDICIAL AUTHORITIES OF JAPAN FOR COSTS INCURRED IN EXECUTING THE REQUESTING COURT'S LETTER OF REQUEST. THEY ALSO EXPRESS A WILLINGNESS TO REIMBURSE **HITACHI-LG DATA STORAGE, INC.**, FOR THE REASONABLE EXPENSES INCURRED IN CONNECTION WITH THEIR PRODUCTION OF DOCUMENTS AND TESTIMONY.

DATED:

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JUDGE, THE UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF CALIFORNIA

[SEAL OF THE COURT]

